

EXHIBIT C

COMMONWEALTH OF MASSACHUSETTS

HAMPSHIRE, ss.

SUPERIOR COURT

Docket No.:

**BENJAMIN A. MADDISON,
Plaintiff,**

v.

:

**Clay Delano
Andrew Kohl
Shield Hotel Management
Aidan Young**

Defendant

COMPLAINT

Plaintiff, Benjamin Maddison (“Plaintiff” or “Mr. Maddison”) brings this action for damages against the Defendants, Police Officer for the City Of Northampton Andrew Kohl as an individual and as an agent of the city, Police Officer Clay Delano as an individual and as an agent of the city, Both are employed at 29 Center Street Northampton Massachusetts located in Hampshire county. Shield Hotel Management Group located at 844 North King Street Northampton Massachusetts which operates Quality Inn Suites located at 117 Conz Street Northampton Massachusetts as well as the Manager of this establishment Mr. Aidan Young.

Count 1 and 2

Defamation of character

Violation of the first Amendment

On September 13th 2020 at 12:46 PM Plaintiff was recording and documenting the behaviors of Northampton Police Officers working a police detail near NETTA Marajunna dispensary, Officer Tom Briotta was observed attempting to solicit a trespass order to NETTA management present were Andrew Kohl and Clay Delano even though Plaintiff was on public property. It seems as Officers are annoyed by the plaintiff exercising his rights and are looking for crime to create which falls under defamation and intimidation. Even though the Police Department has a policy which is as follows P249 of the city states officers may not discourage a citizen from recording through threats or intimidation, Plaintiff has a right to record police officers discharging their duties as long as he doesn't interfere with police operations. The Manager from Netta proceeded to come converse with Plaintiff and after a brief conversation the manager told the plaintiff that they had not called the police but that the police were "informing" them of the plaintiff's presence but were unsure why. Please see exhibit A video of conversation had with the Manager of NETTA. Please note No call was made to the Northampton Police from any business

for assistance. Mr Kohl and Mr Delano proceeded to leave NETTA and to go to the Quality Inn and solicit a trespass to the manager as the plaintiff had parked his car there, but was never asked to move it. Under Mass Trespass law MGL 266 Section 120 “persons shall be notified that they are not allowed there or have signage posted before a trespass can be issued” The Quality Inn has no signs posted and the plaintiff would have moved his car if the manager asked him to but he did not. Please see Exhibit B photograph of the front of the business showing no signs posted. Officer Kohl and Delano were interfering and attempting to intimidate the plaintiff from educating the public on the First Amendment which under Mass TORT laws and trespass laws as well as the United States Constitution which all reinforce one's right to educate and record police carrying out their duties in public.

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Award Plaintiff **\$100,000** (One Hundred Thousand) in presumed damages, Plaintiff requests **\$25,000** (Twenty Five Thousand) from each Defendant – Plaintiff asserts that Shield Management group had no lawful reason to trespass plaintiff and that Officers Kohl and Delano had no reason to suspect plaintiff was trespassing.
- B. Award Plaintiff his costs and disbursements of this suit, including, without limitation, reasonable attorneys’, accountants’ and experts’ fees and such interest as may be allowed by law
- C. Plaintiff requests the court remove this trespass order as it has damaged the plaintiff's reputation and portrays the plaintiff as committing a crime he did not commit and was used to intimidate Plaintiff for exercising his rights.

Dated: By plaintiff himself

Benjamin A. Maddison
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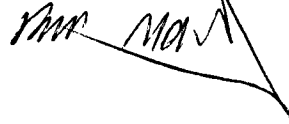
A handwritten signature in black ink, appearing to read "Ben Maddison", with a long, sweeping horizontal line extending to the right.

Exhibit A

Exhibit B

